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REMARKS

Claims 1, 4-11, 13-15 and 16, as amended, remain herein.

Claim 1 has been amended to recite a plurality of grammar files all written all written in the XML language in text format, each grammar file comprising a description grammar describing a syntax of a respective graphic automation language written in XML language which an XML application description file must recognize, the internal memory for storing at least one such XML application description file, each such XML application description file describing part of an automation program for execution in automation equipment and written in at least one graphic automation language compliant with the XML language, wherein the programming station is for using at least one of the description grammars to generate such automation program. See following discussion. Claims 2, 3 and 12 have been cancelled without prejudice or disclaimer.

This Amendment places all claims 1, 4-11, 13-15 and 16 in condition for allowance, and surely in better condition for any appeal. Thus, entry of this Amendment and allowance of all claims 1, 4-11, 13-15 and 16 are respectfully requested.

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1. Claims 1-10 were rejected under 35 U.S.C. §112, first and second paragraphs. Claims 2, 3 and 12 have been cancelled, thereby mooted their rejection. The Office Action suggests that the meaning of the term "grammar file" is any file having rules or structure defined by the "grammar." Actually, in the presently claimed invention, claim 1 recites an internal memory for storing a plurality of grammar files written in the XML language in text format, and further recites each grammar file including a description grammar describing a respective graphic automation language for generating an automation program for execution in automation equipment. See applicants' specification, page 2, lines 6-22, describing a "grammar file" as a file having a description grammar describing a graphic automation language defined as a IEC 1131-2-compliant language, and applicants' specification annexes 4-6, showing examples of XML grammar files describing a syntax for each of three (Ladder, GFC and FBD) graphic automation languages written in the XML language, which XML application description file must recognize.

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Moreover, claim 1 recites the grammar files each including a description grammar describing a syntax of a respective graphic automation language written in the XML language in text format which an XML application description file must recognize, and for storing at least one such XML application description file, each such XML application description file describing part of an automation program for execution in automation equipment and written in at least one graphic automation language compliant with the XML language, wherein the programming station is for using at least one of the description grammars to generate from the application description file an automation program for execution in automation equipment and written in at least one graphic automation language compliant with the common syntax. Accordingly, claims 1 and 3 are both definite and supported by the description in the specification, and reconsideration and withdrawal of the rejection are respectfully requested.

2. Claims 14-16 were rejected under 35 U.S.C. §112, second paragraph, as being indefinite. Claim 14 has been amended to replace the term "application description files" with

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"a part of such automation program," thereby mooting the rejection. Reconsideration and withdrawal of the rejection are respectfully requested.

3. Claims 1-4 and 11-14 are rejected under 35 U.S.C. §102(e) over Lawrence et al. U.S. Patent 6,393,341. Claims 2, 3 and 12 have been cancelled, thereby mooting their rejection.

The Office Action cites Lawrence '341, column 4, lines 32-34, as allegedly disclosing an interface layer 20 that permits applications to operate with any type meter, wherein a repository of meter descriptions allegedly corresponds to applicants' plurality of grammar files. Lawrence '341, column 3, lines 31-42, describes interface 20 as a translator for allowing the application to communicate with the meters to issue a request to the meter, i.e., "[t]he interface 20 acts as a bridge between the communications media used by the application 10 and that used by the utility meter 30." Lawrence '341 does not disclose such interface 20 as being a programming station for executing an automation program in automation equipment (allegedly the meter), because no resulting automation program

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is disclosed (interface 20 merely makes a request). And, even if such a request or the response to the request were deemed to be an executed program, Lawrence '341 does not disclose or suggest anything about such requests being in a graphic automation language compliant with the XML language, as recited in applicants' claims 1 and 11, nor is it inherent that such would be the case.

Moreover, although Lawrence '341 describes a repository of meter description files for each meter, such files do not correspond to applicants' grammar files because claims 1 and 11 recite each such grammar file including a description grammar describing a syntax of a respective graphic automation language written in the XML language, as recited in applicants' claims 1 and 11. Lawrence '341 does not disclose anything about utilizing such a graphic automation language, nor using such language for executing an automation program. No such generated program is described.

For the foregoing reasons, Lawrence '341 fails to disclose all elements of applicants' claimed invention, and therefore is not a proper basis for rejection under §102. And, there is no

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disclosure or teaching in Lawrence '341 that would have suggested the desirability of modifying any portions thereof effectively to anticipate or suggest applicants' presently claimed invention. Claim 4, which depends from claim 1, is allowable for the same reasons explained herein for claim 1, and claims 13 and 14, which depend from claim 11, are allowable for the same reasons explained herein for claim 11. Accordingly, reconsideration and withdrawal of this rejection are respectfully requested.

4. Claim 11 was rejected under 35 U.S.C. §102(e) over Nixon U.S. Patent 5,801,942.

The presently claimed automation equipment for executing an automation program includes memory means for storing a plurality of automation XML application description files expressed in the XML language, each XML application description file describing at least part of an automation program and written in at least one graphic automation language compliant with the XML language, the automation equipment also comprising translation means for converting each XML application description file into a binary

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language that can be executed by the automation equipment. This arrangement is nowhere disclosed or suggested in the any of the cited references.

The Office Action cites Nixon '942 as allegedly disclosing an internal memory storing grammar file 402 in text format, containing a description grammar for automation applications, for at least one graphic automation language. However, Nixon '942 does not disclose the grammar files being written in the XML language, wherein the associated description grammar describes a syntax of the graphic automation language that an XML application description file must recognize, as recited in applicants' claim 11.

Moreover, Nixon '942 does not disclose the automation equipment also comprising translation means for converting each XML application description file into a binary language that can be executed by the automation equipment.

For the foregoing reasons, Nixon '942 fails to disclose all elements of applicants' claimed invention, and therefore is not a proper basis for rejection under §102. And, there is no disclosure or teaching in Nixon '942 that would have suggested

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the desirability of modifying any portions thereof effectively to anticipate or suggest applicants' presently claimed invention. Accordingly, reconsideration and withdrawal of this rejection are respectfully requested.

5. Claims 2-10 and 16 were rejected under 35 U.S.C. §103(a) over Lawrence '341 and Nixon '942. Claims 2 and 3 have been cancelled, thereby mooting their rejection.

Claims 4-10, which depend from claim 1, are allowable for the reasons explained herein for claim 1 and claim 16, which depends from claim 11, is allowable for the reasons explained herein for claim 11.

For the foregoing reasons, neither Lawrence '341 nor Nixon '942 contains any teaching, suggestion, reason, motivation or incentive that would have led one of ordinary skill in the art to applicants' claimed invention. Nor is there any disclosure or teaching in either of these references that would have suggested the desirability of combining any portions thereof effectively to anticipate or suggest applicants' presently



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claimed invention. Accordingly, reconsideration and withdrawal of this rejection are respectfully requested.

6. Claim 15 is rejected under 35 U.S.C. §102(b) (understood to mean "§103(a)") over Lawrence '341 and Lau U.S. Patent 6,598,219.

The Office Action admits that Lawrence '314 does not disclose means of checking that the description of the application in the XML language satisfies the description grammar of the graphic automation language used, and cites Lau '219 as allegedly teaching same. However, Lau '219 does not provide the other deficiencies of Lawrence '341 explained herein.

For the foregoing reasons, neither Lawrence '341 nor Lau '219 contains any teaching, suggestion, reason, motivation or incentive that would have led one of ordinary skill in the art to applicants' claimed invention. Nor is there any disclosure or teaching in either of these references that would have suggested the desirability of combining any portions thereof effectively to anticipate or suggest applicants' presently

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claimed invention. Accordingly, reconsideration and withdrawal of this rejection are respectfully requested.

All claims 1, 4-11, 13-15 and 16 are now proper in form and patentably distinguished over all grounds of rejection stated in the Office Action. Accordingly, allowance of all claims 1, 4-11, 13-15 and 16 is respectfully requested.

Should the Examiner deem that any further action by the applicants would be desirable to place this application in even better condition for issue, the Examiner is requested to telephone applicants' undersigned representatives.

Respectfully submitted,

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